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January 9, 2020

**VIA ECF**

Hon. Dennis M. Cavanaugh  
 Special Master  
 McElroy, Deutsch, Mulvaney & Carpenter, LLP  
 1300 Mount Kemble Avenue, P.O. Box 2075  
 Morristown, New Jersey 07962

**Re: *In re Valeant Pharmaceuticals International, Inc. Securities Litigation*,  
 Master File No. 15-cv-07658 (MAS) (LHG); *In re Valeant Pharmaceuticals  
 International, Inc. Third-Party Payor Litigation*, No. 16-cv-03087 (MAS)  
 (LHG)**

Dear Judge Cavanaugh:

This firm represents Defendants Valeant Pharmaceuticals International, Inc. ("Valeant," n/k/a Bausch Health Companies Inc.) and certain individuals in the above-captioned litigation. Dean McGee, a member of the bar of the State of New York was admitted *pro hac vice*, or has a motion for admission pending, in the following matters on the following dates:

<b>Matter</b>	<b>Date</b>
15-cv-07658 ( <i>In re Valeant Securities Litigation</i> )	May 17, 2017
16-cv-03087 ( <i>In re Valeant Third-Party Payor Litigation</i> )	June 8, 2018
16-cv-05034 ( <i>T. Rowe Price</i> )	September 22, 2017
16-cv-06127 ( <i>Equity Trustees</i> )	September 22, 2017
16-cv-06128 ( <i>Principal Funds</i> )	September 22, 2017
16-cv-07212 ( <i>BloombergSen</i> )	February 16, 2017
16-cv-07324 ( <i>Discovery Global</i> )	September 22, 2017
16-cv-07328 ( <i>MSD Torchlight</i> )	September 22, 2017
16-cv-07494 ( <i>Incline Global</i> )	September 22, 2017
16-cv-07496 ( <i>VALIC Co. I</i> )	September 22, 2017
16-cv-07497 ( <i>Janus Aspen</i> )	May 17, 2017
17-cv-06365 ( <i>Lord Abbett</i> )	February 5, 2018
17-cv-06513 ( <i>Okumus</i> )	February 5, 2018
17-cv-07552 ( <i>Pentwater</i> )	January 29, 2018
17-cv-07625 ( <i>Pub. Emps. Ret. Sys. of Miss.</i> )	February 5, 2018
17-cv-07636 ( <i>Boeing</i> )	February 5, 2018
17-cv-12088 ( <i>Första AP-Fonden</i> )	April 11, 2018
17-cv-12808 ( <i>St. Bd. Of Admin. Of Fla.</i> )	April 11, 2018
17-cv-13488 ( <i>Regents of the Univ. of Cal.</i> )	April 11, 2018
18-cv-00032 ( <i>New York City Emps. Ret. Sys.</i> )	April 11, 2018
18-cv-00089 ( <i>GMO Trust</i> )	April 11, 2018

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18-cv-00383 ( <i>Colonial First</i> )	April 11, 2018
18-cv-00846 ( <i>Bharat Ahuja</i> )	April 11, 2018
18-cv-00893 ( <i>Brahman Capital</i> )	April 11, 2018
18-cv-02286 ( <i>Senzar Healthcare</i> )	May 2, 2018
18-cv-08595 ( <i>2012 Dynasty UC</i> )	June 8, 2018
18-cv-08705 ( <i>Hound Partners</i> )	June 20, 2018
18-cv-12673 ( <i>Catalyst</i> )	October 19, 2018
18-cv-15286 ( <i>Northwestern</i> )	February 1, 2019
18-cv-17393 ( <i>Aly</i> )	February 1, 2019

Mr. McGee is no longer associated with Simpson Thacher & Bartlett LLP. Accordingly, pursuant to L. Civ. R. 101.1(c)(5), we respectfully request the Court's approval of Mr. McGee's withdrawal as *pro hac vice* counsel for Valeant, Robert Ingram, Anders Lönner, Robert L. Rosiello, Ari S. Kellen, Robert N. Power, Theo Melas-Kyriazi, Norma Provencio, Katharine B. Stevenson, Ronald H. Farmer, and Colleen A. Goggins. The other attorneys from McCarter & English LLP and Simpson Thacher & Bartlett LLP remain counsel of record and *pro hac vice* counsel for Valeant in the above-referenced matters.

If this request meets with Your Honor's approval, we respectfully request that Your Honor "so order" this letter, pursuant to L. Civ. R. 101(c)(5).

Respectfully submitted,

/s/ Richard Hernandez

Richard Hernandez

cc: All Counsel of Record (via ECF)

IT IS SO ORDERED this \_\_\_\_ day of \_\_\_\_\_, 2020.

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Honorable Dennis M. Cavanaugh, Special Master